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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

11
12 MARIA KUZMINOVA, on behalf of
13 herself and a class of similarly situated
employees,

14 Plaintiffs,

15 v.

16 READY RESPONDERS, INC., a Delaware
corporation, and DOES 1 through 10,
17 inclusive,

18 Defendants.
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20
21
22

Case No. 21STCV13080
Consolidated with Case No. 21STCV07377

*Assigned for all purposes to: Hon. Yvette M.
Palazuelos, Dept. SSC- 9*

CLASS ACTION

**DECLARATION OF MARIA KUZMINOVA
IN SUPPORT OF UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AND
SEEKING LEAVE TO FILE
CONSOLIDATED CLASS AND
REPRESENTATIVE ACTION COMPLAINT**

DATE: April 12, 2022

TIME: 10:00 A.M.

DEPT.: SSC-9

Action Filed: April 6, 2021

1
2 I, MARIA KUZMINOVA, hereby declare and state as follows:

3 1. I am the named Plaintiff in this lawsuit against Defendant Ready Responders, Inc.
4 ("Defendant"), and I submit this declaration in support of Plaintiffs' Unopposed Motion for
5 Preliminary Approval of Class Action Settlement. I am a competent adult and worked for
6 Defendant as a full-time, non-exempt employee in Los Angeles County during the relevant time
7 period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify
8 to them, I could and would do so competently.

9 2. I contacted my current attorneys when I questioned the employment practices of
10 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
11 Representative in a representative action on behalf of other employees of Defendant who I
12 believed were being subjected to labor law violations. Although presented with the opportunity,
13 I did not to pursue this case on an individual basis and instead did so on a representative basis so
14 that I could help other employees recover for what I believed were Defendant's illegal practices.

15 3. Specifically, I questioned Defendant's policies of failing to compensate employees
16 for time worked off-the-clock, failing to provide all meal and rest periods, failing to properly
17 reimburse employees for all expenses incurred during the discharge of their job duties, failing to
18 timely compensate employees upon separation, and issuing its employees deficient wage
19 statements. Through many discussions with my lawyers, I learned these may be illegal practices
20 and Defendant's employees might have recourse for them.

21 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
22 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
23 this case resolved itself favorably, but always knew that I could also be responsible for paying
24 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
25 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were
26 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and
27 settlement.

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5. I am pleased with the results of this litigation. I am satisfied that Defendant is compensating class members for unpaid wages, penalties, and interest that I believe we are due.

6. At the onset of this case, I spent time through numerous phone calls with several of my attorneys explaining what I understood to be the policies and practices of Defendant and how they were applied to me and others I worked with.

7. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible.

8. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that have spent a total of approximately 10-15 hours assisting my attorneys with the preparation of this case, and doing work and analysis independent from my attorneys both before and during this case, including conducting an independent investigation of the facts.

9. Before this litigation commenced, and throughout its course, I have spent approximately two to four hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

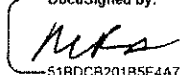
10. I have communicated with my attorneys several times per month to track my case's status. I have taken an active involvement in this matter throughout its course.

11. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment – employers who learn that I sued Defendant in a class action are likely to avoid hiring me.

12. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit – for Defendant to change its labor practices going forward and to compensate current and former employees – are the same as those of all other class members.

1 I declare, under penalty of perjury, under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this 5th day of January 2022 at Tarzana, California.

4 DocuSigned by:
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6 S1BDCB201B5E4A7
7 MARIA KUZMINOVA